



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

FEB 28 2012

Mr. Drew DeBerry  
Deputy Commissioner  
Texas Department of Agriculture  
P.O. Box 12847  
Austin, Texas 78711

Dear Mr. DeBerry:

Enclosed is the "End-of-Year Review of the FY 2011 Texas Department of Agriculture Cooperative Agreement for Pesticides.

Review by the Region 6 Environmental Protection Agency pesticides staff was conducted by an on-site visit in Austin with your Pesticides Division's staff during December 13-15, 2011. The thorough reports provided by your staff allowed us to document your program efforts and demonstrate the environmental benefits resulting from those efforts. Thank you for working with us on the national focus towards program accountability and performance measurement.

We have no formal recommendations in regard to the End-of-Year Review. We appreciate the cooperation we receive from you and your staff and we look forward to our ongoing partnership. Should you have any questions or comments, please contact me or Lee McMillan, your EPA Project Officer at 214-665-6404.

Sincerely,

A handwritten signature in dark ink, appearing to read "C. Edlund", written over a horizontal line.

Carl E. Edlund, P.E.  
Director  
Multimedia Planning and  
Permitting Division

Enclosure

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## **U.S. Environmental Protection Agency**

End of Year Review of the  
FY 2011  
Texas Department of Agriculture Cooperative Agreement for Pesticides

**February 24, 2012**

## **I. BACKGROUND**

### **A. General**

- 1. Project Period:** Start Date: September 1, 2010  
End Date: August 31, 2011
- 2. EPA Assistance Agreement Number:** E-00635511
- 3. Review method:** On-Site Review at the Texas Department of Agriculture Pesticide Division office in Austin, Texas.
- 4. Review participants:**
  - EPA: Lee McMillan, Project Officer, Texas Department of Agriculture  
Jerry Oglesby, Worker Safety Coordinator
  - State: David Kostroun, Chief Administrator for Agriculture and Consumer Protection  
Stephen Pahl, Administrator for Consumer Protection  
David Gipson, Assistant General Counsel  
Leslie Smith, Director for Consumer Service Protection  
Randy Rivera, Director for Environmental and Biosecurity Programs  
Burgess Cook, Coordinator for Pesticide Certification and Compliance  
Michael Kelly, Compliance Coordinator, Structural Pest Control Service  
Dale Scott, Registration Specialist  
April Dickerson, Registration Specialist  
Billy Henderson, Registration Specialist  
Ed Gage, Registration Specialist  
Marty Fowler, Compliance Specialist  
David Villarreal, Program Specialist  
Richard Eyster, Program Specialist  
Amanda Fowler, Case Preparation Officer
  - Alan Cherepon, TCEQ  
Joe Peters, TCEQ
- 5. Review date(s) and location:** The end of year (EOY) review of the Texas Department of Agriculture Pesticides Program occurred from during December 13-15, 2011 in Austin, Texas.

### **B. Scope of Review**

This is the EOY review for the **cooperative agreement** between the U.S. Environmental Protection Agency Region 6 (EPA) and the Texas Department of Agriculture (TDA). This review is a joint evaluation as described in the work plan and 40 CFR §35.115. Program accomplishments, effectiveness, problem areas, suggestions for improvement, and any resolutions to problems are described in the sections that follow.

## II. FINANCIAL

### A. Budget Analysis

The following table summarizes funding and expenditures.

Work Plan Component	EPA Funding	State Funding	Total Funding	Funds Still Available
Enforcement	\$ 902,565	\$ 159,274	\$ 1,061,839	\$0
C&T	\$ 109,157	\$ 109,157	\$ 218,314	\$0
Programs (WPS, GW, ES) <sup>1</sup>	\$ 157,416	\$ 27,778	\$ 185,194	\$0
<b>TOTAL</b>	<b>\$1,169,138</b>	<b>\$ 296,209</b>	<b>\$ 1,465,347</b>	<b>\$0</b>

<sup>1</sup> WPS = Worker Protection Standard, GW = Ground Water Program, and ES = Endangered Species Program

**NOTE:** As of December 06, 2011, the Final Financial Status Report (FSR) was received and processed. The cooperative agreement is financially closed. The Close-Out Inquiry was signed by the Project Officer on December 06, 2011.

### B. Re-budgeting

There was no re-budgeting by TDA during this year.

## III. COOPERATIVE AGREEMENT ADMINISTRATION

### A. Post-award checklist

The post-award checklist is completed by EPA and placed in the TDA Cooperative Agreement file. This documents the requirements by the EPA Grant Programs office that TDA did use Cooperative Agreement funding from EPA for items outlined in our Government Performance Results Act (GPRA) Goal 4.1, as well as the Work Program negotiated for the cooperative agreement.

### B. Recommended Actions from our Grant Programs office.

There were no recommendations from our Region 6 Grant Programs office.

## IV. COMPLIANCE AND ENFORCEMENT

### A. State Reports

1. Pesticide Assessment Rating Tool (PART), the Enforcement Outcome Measures report, is no longer a requirement as of FY 2011
2. 5700-33H reports were submitted to EPA Region 6 for FY 2011. These reports provide an annual summary of inspections and enforcement actions in Texas and

reflect activities for inspections and enforcement of the Texas Department of Agriculture's Pesticides Division.

TDA enforcement actions for FY 2011 include **97** warning letters and **49** cases where fines were assessed. TDA had no license/certification suspensions, license/certification revocations, or license/certification conditions/modifications. A total of **8,233** inspections were completed by TDA in FY 2011. TDA had a total of **135** stop-sale, seizure, quarantine, or embargo of products. The largest number of inspections completed by TDA included **5,361** Certified Applicator Records inspections, **1,106** Marketplace inspections followed by 925 Restricted Use Dealer inspections.

## **B. Case File and Enforcement Action Evaluation**

### **1. Significant Cases (FIFRA Section 27)**

There were no FIFRA Section 27 cases in Texas during FY 2011.

### **2. Routine Cases – other than Worker Protection**

EPA staff review all inspection reports from referrals sent to TDA. The federal inspections completed include narratives, receipts for samples, photos of products, labels, invoices, and shipping records. Federal inspections at producer establishments were also conducted by TDA.

The following case and inspection files were reviewed. A State Case Review Checklist was completed for each.

<u><b>Case/Inspection #</b></u>	<u><b>Complainant</b></u>	<u><b>Type</b></u>	<u><b>Outcome</b></u>
Texas Wildlife Service (Kyle Traweck) – Incident #: 00006891	Angel Walker	Follow-Up / Ag	Case Pending
Jon Hur – Incident #: 00007714	Kim Hur	Follow-Up / Non-Ag	Case closed due to lack of evidence

<u><b>Case/Inspection #</b></u>	<u><b>Complainant</b></u>	<u><b>Type</b></u>	<u><b>Outcome</b></u>
Farmers Co-op Elevator Assoc.(Jerry Duff, Tracey Harris, and Jim McCutle) – Incident #: 00008049	Texas Department of Ag	Routine / Ag	Notice of Violation -- \$1,300
Juan Herrera – Incident #: 00005983	Gary Casey	Follow-up / Ag	Notice of Violation -- \$1,050
Skylor Richard – Incident #: 00007283	Robert Edwards	Follow-up / Ag	Notice of Violation -- \$2,300
ABC Pretreat (Dana Kaneubbe) – Incident #: 00006623	Tommy Gisler	Follow-up / Non-Ag	Notice of Violation -- \$500
The Tree Doctor – Case#: S011-12-0033	Oscar Mestas	Follow-up / Ag	Pending
Philip Hughes – Case#: S011-12-0042	Walter Hammock	Follow-up / Ag	Pending
Wildtrap (Randal Kennedy) – Incident#: 00008882	Cora Rencher	Follow-up / Ag	Referred to State Attorney General
Handyman Service (Daniel McOmber) – Case#: S011-10-0163	Texas Department of Ag	Routine / Non-Ag	Notice of Violation -- \$400

The case files reviewed were consistent in their content. Their electronic format enhances consistency via a structured format for documentation. TDA enforcement actions were consistent with their Enforcement Response Policy penalty matrix.

### **C. Compliance Priority – Worker Protection Standard (WPS)**

#### **1. Reports**

- a. The Pesticide Worker Protection Standard (WPS) Inspection and Enforcement Accomplishment Report (Supplemental Form 5700-33H) was included in TDA's FY 2011 final report.
- b. The FY 2011 Texas Reporting Form for Pesticide Worker Safety is supplied electronically to OECA.

#### **2. Significant WPS Cases (FIFRA Section 27)**

There were no significant WPS cases under Section 27.

#### **3. WPS oversight inspections**

There were no WPS oversight inspections.

#### **4. WPS Case File evaluation**

WPS case narrative summaries for three cases where administrative or other enforcement actions were provided in the end-of-year report. During the site review, four WPS case files were reviewed. Case file documentation supported the enforcement actions. Only one of the case files could the inspector have added additional narrative to more fully document their findings. Of the three case files reviewed only one was assessed a of \$1,200 administrative penalty. All reviewed WPS cases had a letter of noncompliance. Pesticide safety training violations was found in one of the three case files that were reviewed. Additional violations that were listed included violations for: pesticide applications, central posting, and emergency assistance.

TDA reported one case involving the potential occupational exposure to two workers during this reporting period.

#### **5. WPS Compliance Analysis**

The TDA's penalty enforcement actions above did follow TDA's Enforcement Response Policy as written by the agency. Of the total 240 inspections, there were a total of two cases assessed fines for the year that were reported on the WPS 5700-33H form. Of the violations found, from March 1 to August 31, 2011, there was a total of \$1,200.00 collected in fines by TDA. The WPS violations found in FY 2011 included five for pesticide safety training, two for failing to provide all the required supplies at the decontamination site, one for notice of application, one for early entry, and five violations of central posting. A total of two cases were assessed fines and two were issued warnings.

The TDA has reviewed their WPS State Implementation plan and Compliance Monitoring Strategy and determined their focused area of efforts to ensure WPS compliance. Of that list of 4,070 total agricultural inspections conducted for FY 2011: about 5.92% (240) of the certified applicators were inspected at a Tier I WPS; 95.9% (230) of those inspected were found in compliance; 4.1% of the Tier I WPS (10) were found to be in noncompliance.

#### **6. Worker Protection Risk-Based Targeting Strategy**

- a. TDA has reviewed their WPS State Implementation Plan and continue to target applicators that have never been inspected. TDA has indicated they will use a risk-based strategy for FY 2011 and 2012.
- b. TDA stated they have developed a different risk-base approach that concentrates on pesticide applicators and commercial applicator businesses in an effort to improve the level of WPS compliance.

## **D. Inspection and Enforcement Support**

### **1. Training**

TDA has 26 inspectors with Federal EPA FIFRA credentials. FIFRA Inspections conducted with Federal credentials are being sent to EPA for review, and are being logged into EPA Region 6's tracking system for federal inspections. The Region 6 Pesticide Enforcement Team conducts inspector trainings for those with Federal EPA credentials, and inspections conducted by these inspectors are reviewed by EPA Region 6.

### **2. Enforcement Response Policy**

TDA's Pesticide Administrative Penalty Matrix was finalized on June 9, 2000. Texas Agriculture Code (the Code), 76.155 confers administrative penalty authority to the TDA. Section 76.1555(b) requires the TDA to "...establish a schedule stating the types of violations possible under Chapters 75 and 76 of this code and the maximum fine applicable to each type of violation. Pursuant to the provisions of Chapter 76 of the Code, the department has primary responsibility and authority for regulating pesticides in the State of Texas." TDA may assess penalties not to exceed \$2,000 for each violation, provided that the penalty does not exceed \$4,000 for all violations related to a single incident." TDA uses their existing penalty matrix to assess fines in all cases.

### **3. Neutral Inspection Scheme**

TDA uses a neutral inspection scheme for producer establishment inspections. The EPA Region 6 Pesticides Section supplies a listing of all pesticide producing establishments from EPA's Section Seven Tracking System (SSTS) database.

TDA Regional Offices are assigned prime targets for Section 7 establishment inspections. Texas has over 600 registered Section 7 establishments. TDA focused on those producer establishments that were listed as cancelled by EPA.

### **4. Inspection and Enforcement Procedures**

TDA separates their enforcement group and their inspection group as a function of their organization. The Pesticide Division has field inspectors that conduct inspections, then each regional office forwards inspection reports to the Enforcement Section in the Legal Affairs and General Council's office for civil penalty and administrative actions.

EPA conducted one joint inspection with staff from the TDA for the sampling of an anti-microbial pesticide. For those inspections that EPA requested narrative reports, TDA provided them.

### **5. Quality Assurance**

TDA reported one problem in their FY 2011 Quality Assurance (QA) Annual Report. The QA Program final report was sent to EPA Region 6 Pesticides Section in July 2011. TDA reported a problem with sample matrix interference for samples requiring



dilution for LC-MS/MS analyses. The laboratory is currently developing and employing new extraction and cleanup methods to negate the matrix interference associated with LC-MS/MS extracts.

**a. QA Audit**

A QA audit was not conducted.

**b. Other QA observations**

There were no QA observations.

**c. Laboratory visit summary**

EPA Region 6 Pesticides Section did not conduct a laboratory visit.

**E. Special activities requested by EPA Region 6**

EPA Region 6 Pesticides Section requested five import inspections. Inspections were completed in a timely manner.

**F. State-specific priority work**

TDA is not undertaking any State-specific priority work.

**G. New Legislation and Regulations**

There have been no recent changes in legislation or regulations or the state.

**H. Action Items from Previous Midyear Review**

EPA had no recommendations from the previous Midyear Review.

**I. Conclusions and Recommendations for Compliance/Enforcement**

EPA appreciates the time and effort of Mr. Burgess Cook, Michael Kelly, Randy Rivera and Leslie Smith regarding a review of databases, follow-up inspections, referrals, and final reports on cases during the EOY Review. A review of the files indicated some inconsistencies in the documentation. Some of the documents in case files did not contain sufficient information to stand on its own merits if the document was separated from the file. Therefore, it is the recommendation of the EPA that special attention be given to the case files so that all documents in the case file contain enough information to stand alone.

## V. PROGRAMS

### A. Worker Safety

#### 1. Certification and Training of Pesticide Applicators

##### a. Previous Recommendations:

No formal recommendations were made in the Midyear FY 2011

##### b. Accomplishments

##### i. Work-Plan Commitments and National Program Priorities

TDA reported at total of **18,624** individuals with commercial applicator certifications and **41,552** individuals with private applicator certifications during this reporting period. They also reported **2,013** individuals with commercial applicator certifications and **3,221** individuals with private applicator certification were initially certified during this reporting period. In addition, **23,572** individuals with commercial applicator certifications and **11,171** individuals with private applicator certifications were recertified during this reporting period.

The Texas Structural Pest Control Service and the TDA licensing systems have been merged into one data system and appear to be working. The merger of the data for the two licensing systems was a large undertaking for the TDA staff.

TDA did not report any licenses revoked or suspended during this reporting period. TDA did assess financial penalties to 52 commercial applicators and 12 private applicators. They also issued non financial penalties (warning, advisory letters, etc.) to 152 commercial applicators and 31 private applicators.

The TDA Staff monitored 15 agricultural recertification/training programs and 19 structural recertification/training programs during 2011. TDA also reviewed 561 courses, which were approved for CEU credits during FY 2011. TDA approved 1,664 CEUs during this reporting period. Texas AgriLife Extension revised the following training manuals this reporting period: "Health Related Pests: Vector and Rodent Control", "Termite", and both the TDA and SPCS Laws and Regulations. TDA is continuing to work with Texas AgriLife Extension to develop pools of questions that can be used for recertification examinations. TDA and Texas AgriLife are exploring ways to improve computer training and testing through web based computer generated examinations. They are looking at several software companies and have identified an infrastructure that is currently in place through the state's community college systems. One of the issues that has been identified is how to make up for lost funding from the

Structural Pest Program if they go to a computer testing program. The estimated shortfall in funding would be approximately \$250,000 annually.

The TDA had 15,967 total attendees at their Agricultural and SPCS Pesticide Trainings and in Texas in 2011. The TDA staff approved agricultural courses for continuing education for 1,664 CEU credits for Agriculture and 753 CEU for Structural from January 2011 to September 2011. The CEU courses are valid for one calendar year. The SPCS education staff approves CEU courses which are valid for one calendar year, also including general laws, safety, IPM, termites, weeds, structural fumigation, commodity fumigation, and wood preservation.

The TDA has indicated that all required data will be submitted in the national CPARD database by the December 31, 2011, as required in their work program.

Staff of TDA attended the National PACT Workshop in Portland, Oregon during the week of August 7, 2011. The workshop was also attended by the Texas AgriLife Extension coordinator. During the workshop both attendees had the opportunity to meet several times during the meeting and also met with the Region 6 Worker Safety Program Coordinator to discuss issues relative to the Texas Certification and Training Program.

TDA staff meets regularly with the Agricultural and Environmental Workgroup of Texas AgriLife Extension to discuss pesticide applicator certification issues. Coordinators talk and/or exchange emails on a weekly if not daily basis to discuss issues related to the Worker Safety Programs.

ii. **Additional Program Activities**

No additional activities were reported for this reporting period.

c. **Performance Assessment Rating Tool (PART) Review Measures**

The State was not required to complete PART Program Review Measures in FY 2011 for the Certification and Training Program.

d. **State/Tribe Feedback**

The State did not provide any feedback on the EPA's Certification and Training program.

**e. Conclusions and Recommendations**

There are no formal recommendations for the Certification and Training program at this time.

**2. Worker Protection Standard (WPS)**

**a. Previous Recommendations**

There were no previous recommendations in the WPS program.

**b. Accomplishments**

**i. Work-Plan Commitments and National Program Priorities**

The Pesticides Staff of TDA continues to focus on activities that support the Worker Protection Standard (WPS) rule. The TDA training of workers and handlers continues to be a priority, along with distributing pesticide safety information in conjunction with their Certification and Training Programs. The TDA issued 3,156 handler cards and 1,455 worker cards during this reporting period. There were 26 worker/handler safety trainings conducted by TDA staff with a total of 3,156 workers and 1,455 handlers trained. TDA noted that five of the sessions were conducted in Spanish.

The TDA meets with the Texas AgriLife Extension on a regular basis to discuss their activities related to the Worker Protection Standard Program in Texas. The TDA inspectors routinely distribute EPA worker/handler training materials and the pesticide exposure brochures at worker/handler training sessions. These materials are also distributed during the laws and regulations presentations at the various continuing education units (CEU) programs across the state.

The EPA has continued to support the distribution of WPS outreach materials that were developed with the cooperation of TDA and farmworkers in the Upper and Lower Rio Grande Valley and the San Antonio, Texas areas. The Region would like to express our appreciation to the TDA staff and their efforts to make these materials available to the farmworkers in Texas. These efforts have provided valuable information to farmworkers related to the risk of take-home exposure to pesticides.

TDA continues to make WPS information available to the various migrant health clinics and public health agencies when requests are received. TDA inspectors in the Rio Grande Valley continue to conduct worker/handler training programs at the various migrant advocacy groups when requested.

TDA has also made available an electronic version of the brochure, “What do I do if I’m Exposed to Pesticides” on the TDA website.

TDA reported a total of three exposures cases involving potential occupational exposure to three workers. Two cases were not reviewed by the TDA toxicologist and were unconfirmed. The third case was reviewed and determined that the worker was not likely exposed.

The TDA did supply EPA with a listing of all WPS Safety Training conducted by them, outlining date, inspector (trainer), region held, city, county, type of training (worker or handler), and number of people in each training (FY-2011 End of Year Report to EPA, pg 4).

**ii. Additional Program Activities**

There was one exposure case involving potential occupational exposure of two workers.

**c. PART Review Measures**

There are no Worker Safety PART Measures.

**d. State Feedback**

The TDA did not provide feedback during this reporting period.

**e. Conclusions and Recommendations**

There are no recommendations at this time.

**B. Water Quality**

**1. Previous Recommendations**

There were no previous recommendations in the Water Quality program.

**2. Accomplishments**

**a. Work-Plan Commitments and National Program Priorities**

The Pesticide Division of TDA continues to collaborate with the Texas Commission on Environmental Quality (TCEQ), Texas Department of State Health Services (DSHA), and Texas Parks and Wildlife Department to track pesticide impacts on water quality in Texas. TDA does not conduct water sampling for pesticide monitoring; however, TDA monitors complaints,

assessments and reports on state's groundwater and surface water. There were no new reports on pesticide contamination of groundwater or surface water incidences of pesticide impairments in Texas. There were also no complaints of pesticide drift into surface water.

TDA collaborates with the Texas Commission on Environmental Quality (TCEQ) in outreach and technical support to protect ground and surface water in Texas. All Texas databases were identified that contained methods and pesticides of interest in Texas. This was in completion of a request from EPA for the water performance measures. Databases of water samples from the state that showed pesticides in water helped TDA and TCEQ identify pesticides of interest (POI's) in Texas. The State FIFRA Issues Research and Evaluation Group Water Quality POI completed the list of 57 pesticides for evaluation of human and ecological toxicity, environmental fate, and use data for specific pesticides.

TDA staff participated in several EPA meetings and conference calls on development of the NPDES Pesticide General Permit. TDA is also working with TCEQ on the development of a Texas discharge general permit. Staff provided input and comments to EPA on the Texas permit drafts.

The Pesticides of Interest National Tracking System (POINTS) database is being used for POI data reporting. TCEQ inputs this data in cooperation with TDA and the Agricultural Subcommittee on Water Quality. The submission of monitoring data for Re-registration Eligibility Decision System review and to support the National Water Quality Measures, as defined by the last USGS Ten Year Report, is being coordinated and reported by TCEQ.

**c. Additional Program Activities**

There are no additional activities at this time.

**3. PART Review Measures**

Water Quality Measures report, is no longer a requirement as of FY 2011

**4. State Concerns**

TDA did not express any concerns.

**5. Conclusions and Recommendations**

There are no recommendations at this time.

**C. Endangered Species**

**1. Previous Recommendations**

There were no previous recommendations.

## **2. Accomplishments**

### **a. Work Plan Commitments and National Program Priorities**

TDA continues to be a leader in the implementation of the Endangered Species program in our Region 6 states. TDA met numerous times with the Texas Parks & Wildlife Department Game Bird Advisory Committee, U.S. Fish and Wildlife Service, Natural Resources Conservation Service, as well as with environmental organizations. Some of these meetings consist of discussing issues surrounding new federal listings of freshwater mussels, habitat programs for the Houston toad (an endangered species), lesser prairie chickens (a federal threatened species), as well as developing a Texas conservation plan for the dunes sagebrush lizard (a federal threatened species).

In addition, TDA provided technical assistance to Texas AgriLife Extension about pesticides training in Bosque, Blanco and Kerr counties. Furthermore, TDA continues to evaluate all Section 18 and 24c registrations of pesticides for impacts on endangered species. In FY 2011, staff worked on Section 18 issues involving possible releases of black-footed ferrets in the Texas Panhandle; also, staff reviewed Section 24c use of warfarin for control of black tailed prairie dogs.

TDA continues to participate in the Edwards Aquifer Recovery Implementation Program, which intends to enhance the Edwards Aquifer and preserve endangered species.

TDA continues to show endangered species county bulletins on their web site, and provides links to EPA's endangered species program. Staff also participated in the Natural Resources Conservation Service's State Wildlife Subcommittee meeting.

### **b. Additional Program Activities**

TDA did not complete additional endangered species program activities.

## **3. PART Review Measures**

There were no endangered species PART measures required.

## **4. State Changes**

In September 2001, Mike McMurry retired from TDA. EPA welcomes David Villarreal as TDA's new Endangered Species program coordinator.

## **5. Conclusions and Recommendations**

There are no recommendations at this time.

**D. Regulatory Exemptions and Experimental Use Permits**

TDA did not have any issue in this area.

**E. Container and Containment Rule Implementation**

**1. Accomplishments**

TDA continues to educate pesticide applicators and the pesticide production facilities about the Container-Containment rule by distributing outreach material, sharing information on their website and delivering presentations to different groups, such as the Texas Agriculture Aerial Applicators, Texas Ag Industries, Texas Farm Bureau and various agricultural producers.

TDA has been conducting container-containment inspections as part of their producer establishment routine inspections. TDA uses OECA's inspector checklist.

In August 17, 2011, TDA was invited to join EPA Region 5's webinar for Pesticide Retailers on Refillable Container, Labeling and Repackaging Rules effective in August 2011. Also, some of this information was shared at the Pre-SFIREG meeting on October 2011.

**2. Conclusions and Recommendations**

Now that the proposed one-year deadline extension (from August 16, 2010 to August 16, 2011) for pesticide storage and disposal label statements compliance date has been met, TDA will need to consider focusing on implementing and enforcing the container-containment rule program, which includes to continue conducting container-containment compliance monitoring; and taking appropriate enforcement action when inspection evidence reveals a violation of container-containment rule standards.

**F. Other Programmatic Activities**

TDA did not complete any additional programmatic activities.